

**SUMMARY OF DAMAGE CALCULATIONS**  
**SIANCAS V. RALLYE MOTORS**  
**14-CV-6151**

	<b>SUMMARY</b>				
	Total	Siancas	Odria	Rapalo	Rivera
FLSA Overtime	\$ 25,229.00	\$ 5,840.00	\$ 7,164.00	\$ 5,100.00	\$ 7,125.00
Spread of Hours (NYLL)	\$ 1,901.61	\$ 1,901.61			
Liquidated Damages	\$ 27,130.61	\$ 7,741.61	\$ 7,164.00	\$ 5,100.00	\$ 7,125.00
NYLL 195(1) Damages	\$ 2,500.00	\$ 2,500.00			
NYLL 195(3) Damages	\$ 2,500.00	\$ 2,500.00			
Prejudgment Interest (NYLL)	\$ 5,750.64	\$ 5,750.64			
 TOTAL	 <u>\$65,011.85</u>	 <u>\$26,233.85</u>	 <u>\$14,328.00</u>	 <u>\$10,200.00</u>	 <u>\$14,250.00</u>
 Settlement Amount	 \$ 160,000.00				
Less: Clients' Share	\$ 65,011.85				
Net:	\$ 94,988.15				
 Less: Costs	 \$ 5,624.76				
Balance: Attorneys' Fees	\$ 89,363.39				

DAMAGE CALCULATIONSEmployee: **Raul Siancas**

7/9/2024

Location: **Rallye Mercedes**

Employed

From 2/1/2013

To 2/1/2014

Date of Filing of Consent 10/23/2014

**OVERTIME (1/2 TIME FOR HOURS OVER 40)**

Begin	End	Weeks	Hours Worked	Regular Rate	1/2 time	OT Hours	Weekly OT Owed	OT Owed	
2/1/2013	2/1/2014	52.14	68.00	\$8.00	\$4.00	28.00	\$112.00	\$5,840.00	\$ 5,840.00

**SPREAD OF HOURS PAY**

Begin	End	Weeks	SOH>10	Days Per Week in which	Min Wage	NYLL Liquidated Damages
2/1/2013	12/31/2013	47.57	5.00	\$7.25		\$1,724.46
1/1/2014	2/1/2014	4.43	5.00	\$8.00		\$177.14

**NYLL LIQUIDATED DAMAGES (100%)**

Overtime Wages	\$5,840.00
Spread of Hours Pay	\$1,901.61
<b>\$7,741.61</b>	

**WAGE NOTICE VIOLATIONS***\$50 per workweek on and after 2/1/2012, up to \$2,500; \$100 per workday on and after 2/27/15, up to \$5,000*

Begin	End	Weeks	Days	Statutory Damages	Max
2/1/2013	2/1/2014	52.14		\$ 50.00	\$2,500.00 <b>\$2,500.00</b>

**WAGE STATEMENT VIOLATIONS***\$100 per workweek on and after 4/9/2011, up to \$2,500; \$250 per workday on and after 2/27/15, up to \$5,000*

Begin	End	Weeks	Days	Statutory Damages	Max
2/1/2013	2/1/2014	52.14		\$ 100.00	\$2,500.00 <b>\$2,500.00</b>

**PRE-JUDGMENT SIMPLE INTEREST, 9%**

Begin	End	Date	Midpoint	# of Yrs	Wages Owed	Interest Owed
2/1/2013	2/1/2014	8/2/2013		10.941	\$5,840.00	\$5,750.64
<b>TOTAL DAMAGES</b>						<b>\$ 26,233.85</b>

DAMAGE CALCULATIONSEmployee: **Billy Odria**

7/18/2024

Location: **Rallye Mercedes****OVERTIME (1/2 TIME FOR HOURS OVER 40)**

Begin	End	Weeks	Hours Worked	Regular Rate	1/2 time	OT Hours	Weekly OT Owed	OT Owed	
9/17/2013	10/20/2014	56.86	68.00	\$9.00	\$4.50	28.00	\$126.00	\$7,164.00	
<b>\$7,164.00</b>									

**LIQUIDATED DAMAGES**

Begin	End	Weeks	Hours Worked	Regular Rate	1/2 time	OT Hours	Weekly OT Owed	FLSA Liquidated Damages	
9/17/2013	10/20/2014	56.86	68.00	\$9.00	\$4.50	28.00	\$126.00	\$7,164.00	
<b>\$7,164.00</b>									
<b>TOTAL DAMAGES</b>									<b>\$ 14,328.00</b>

## DAMAGE CALCULATIONS

**Employee:** Jose Alexander Rivera Rapalo

7/18/2024

Location: **Rallye Mercedes**

## Employed

From 5/25/2012

To 4/24/2014

Date of Filing of Consent 6/15/2015

**OVERTIME (1/2 TIME FOR HOURS OVER 40)**

			Hours	Regular		Weekly OT			
Begin	End	Weeks	Worked	Rate	1/2 time	OT Hours	Owed	OT Owed	
6/15/2013	2/28/2014	36.86	68.00	\$8.00	\$4.00	28.00	\$112.00	\$4,128.00	
3/1/2014	4/24/2014	7.71	68.00	\$9.00	\$4.50	28.00	\$126.00	\$972.00	\$ 5,100.00

**FLSA LIQUIDATED DAMAGES (100% of OT FOR THREE YEARS PRIOR TO COMMENCEMENT)**

								FLSA
Begin	End	Weeks	Hours Worked	Regular Rate	1/2 time	OT Hours	Weekly OT Owed	Liquidated Damages
6/15/2013	2/28/2014	36.86	68.00	\$8.00	\$4.00	28.00	\$112.00	\$4,128.00
3/1/2014	4/24/2014	7.71	68.00	\$9.00	\$4.50	28.00	\$126.00	\$972.00

DAMAGE CALCULATIONSEmployee: **Rossebel Lobo Rivera**Location: **Rallye BMW**

10/21/2014

OVERTIME (1/2 TIME FOR HOURS OVER 40)								
Begin	End	Weeks	Hours Worked	Regular Rate	1/2 time	OT Hours	Weekly OT Owed	OT Owed
<b>10/21/2011</b>	<b>8/1/2012</b>	<b>40.71</b>	<b>68.00</b>	<b>\$12.50</b>	<b>\$6.25</b>	<b>28.00</b>	<b>\$175.00</b>	<b>\$7,125.00</b>

FLSA LIQUIDATED DAMAGES (100% of OT FOR THREE YEARS PRIOR TO COMMENCEMENT)

Begin	End	Weeks	Hours Worked	Regular Rate	1/2 time	OT Hours	Weekly OT Owed	FLSA Liquidated Damages
<b>10/21/2011</b>	<b>8/1/2012</b>	<b>40.71</b>	<b>68.00</b>	<b>\$12.50</b>	<b>\$6.25</b>	<b>28.00</b>	<b>\$175.00</b>	<b>\$7,125.00</b>